

1 UNITED STATES DISTRICT COURT  
2 WESTERN DISTRICT OF WASHINGTON  
3 AT SEATTLE

4 DEBRA CRAIG,

5 Plaintiff,

6 v.

7 NOVARTIS PHARMACEUTICALS

8 CORPORATION,

9 Defendant.

CASE NO. 2:20-CV-1641-TSZ

**502(d) Order**

10 As set forth below, the joint motion is **GRANTED**.

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12 1. This Order shall be applicable to and govern all deposition transcripts and/or  
13 videotapes, and documents produced in response to requests for production of documents,  
14 answers to interrogatories, responses to requests for admissions, affidavits, declarations and all  
15 other information or material produced, made available for inspection, or otherwise submitted by  
16 any of the parties in this litigation as well as testimony adduced at trial or during any hearing  
17 (collectively “Information”).

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19 2. The disclosure of privileged or work-product protected documents, electronically  
20 stored information (“ESI”) or Information, whether inadvertent or otherwise, is not a waiver of  
21 the privilege or protection from discovery in this case or in any other federal or state proceeding.  
22 This Order shall be interpreted to provide the maximum protection allowed by Federal Rule of  
23 Evidence 502(d).

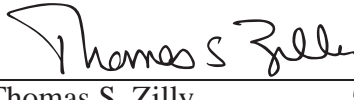
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25 3. Nothing contained herein is intended to or shall serve to limit a party’s right to  
26 conduct a review of documents, ESI or Information (including metadata) for relevance,

1 responsiveness and/or segregation of privileged and/or protected Information before production.

2 Accordingly,

3 **IT IS HEREBY ORDERED** that the Joint Motion for Entry of a 502(d) Order is  
4 **GRANTED.**

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7 DATED: March 28, 2021

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10 Thomas S. Zilly  
11 United States District Judge  
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